

From: [Campbell, Joshua](#)
To: srecce@nrahq.org
Subject: Hey!
Date: Friday, November 17, 2017 9:54:59 AM

Let's do lunch?

From: [Recce, Susan](#)
To: ["joshua.campbell@sol.doi.gov"](mailto:joshua.campbell@sol.doi.gov)
Subject: Comments on SDNM recreational shooting plan
Date: Friday, November 17, 2017 10:29:13 AM
Attachments: [Comments on SDNM recreational shooting plan.docx](#)

Josh,

See exchange of emails. When I talked to Ben about this last month, I had the feeling that the Secretary's office was not going to pursue the concerns that the NRA and other NGOs raised in our comments (attached). We proposed modifying BLM's preferred planning alternative (Alternative C). BLM was under court order to get this shooting plan done by a certain date and, not surprising to me, the agency ran up to the deadline (supposedly the judge would not extend the timeframe) giving the Secretary's office no time to evaluate BLM's decision against the comments we submitted.

Susan

From: Recce, Susan
Sent: Thursday, October 05, 2017 5:51 PM
To: 'benjamin_cassidy@ios.doi.gov' <benjamin_cassidy@ios.doi.gov>
Subject: FW: Comments on SDNM recreational shooting plan

Hi Ben,

I am so happy for you. I think you will find the experience very rewarding. Will Tim Williams be reporting to you? A longtime friend of mine Jim Cason is an assistant Deputy Secretary and when you see him, please give him my regards.

Attached is the comment letter I sent in February. You will see in paragraph 2 that we want a modified Alternative C. Let me know if you have any questions on that. Also below is the BLM staffer we asked for those comments last month.

Best to you!!

Susan

From: Recce, Susan
Sent: Thursday, September 07, 2017 10:52 AM
To: 'cyounger@blm.gov' <cyounger@blm.gov>
Subject: Comments on SDNM recreational shooting plan

Hi Calle,

Attached are the comments the NRA and other NGOs that participate on the Federal Lands Hunting and Shooting Sports Roundtable sent to the BLM last February. As you may know, the Roundtable

was created by a MOU signed by 42 national hunting, fishing, wildlife conservation and shooting sports organizations and the BLM, USFS, USFWS, USACE, with the NPS as ad hoc. The fishing interests do not participate on the Roundtable as they chose to work with the MOU Federal partners in a different forum.

Let me know if you have any questions.

Susan Recce
Director
Conservation, Wildlife and Natural Resources
Institute for Legislative Action
National Rifle Association

Comments on SDNM Draft Target Shooting Plan

February 14, 2017

Wayne Monger, Project Manager
Lower Sonoran Field Office
Bureau of Land Management
21605 North 7th Avenue
Phoenix, AZ 85027

Dear Mr. Monger:

The undersigned organizations appreciate the opportunity to submit comments on the Draft Target Shooting Plan for the Sonoran Desert National Monument (Draft Plan). We have a long-standing and vested interest in access and opportunities on the Sonoran Desert National Monument (SDNM) for recreational shooting as evidenced by comments that several of our organizations have submitted in the past on various phases of the Monument planning process related to the future of recreational shooting in the Monument.

We support Alternative C, the BLM's preferred alternative, but strongly recommend that it be modified as explained further below. The Draft Plan offers five alternative planning scenarios and our comments are in order of the alternatives presented.

Alternative A would continue the 1988 Lower Gila South Resource Management Plan without change. It is an attractive option for shooting enthusiasts because it would allow recreational shooting to take place throughout the SDNM. However, our organizations, along with many sportsmen and women who recreate on public lands within the SDNM, recognize that there are areas within the Monument that must be closed to shooting in order for BLM to fulfill the mandates of monument designation, to balance other recreational activities, and to ensure that shooting takes place in safe venues for shooters and other visitors of the SDNM. We, therefore, oppose Alternative A.

Alternative B reflects the court order closure of 10,599 acres as a temporary measure until the Draft Plan is completed. Although the closure was based on BLM's recommendation, we believe it was ill conceived in that the area is the most popular and accessible area of the SDNM for recreational shooting and it does not contain the important values for which the SDNM was designated. Further, it fails to recognize the importance and potential use of the Juan Bautista de Anza National Historical Trail (NHT). Thus, we oppose adoption of Alternative B.

Alternative C would allow recreational shooting in the Desert Back Country Recreation Management Zone (RMZ) only and partially lift the court ordered closure as addressed in Alternative B. The effect is that 54,817 acres or 11% of the SDNM would be closed to recreational shooting. Our issue with Alternative C is that it includes lands within the NHT Recreation Management Zone (NHT RMZ) that lie alongside the El Paso Natural Gas Company pipeline road and Highway 238. This is where much of the accessible, popular and historic shooting sites are located. We question even why these lands were included in the NHT RMZ, let alone in the SDNM boundary.

Their inclusion seems to be based on the fact that the pipeline road is an identifiable and likely more practical boundary than one drawn across mountainous features or flat land. Irrespective of the reason, in drawing the boundary of the NHT RMZ, the BLM essentially created an arbitrary northwesterly boundary. This finger of land encompasses an area most used and most suitable for recreational shooting. The entire “finger” is outside of the NHT view shed and its lower end is approximately eight air miles from the NHT. Its southeasterly end is nearly five miles from the most northerly boundary of the HNT corridor; eight miles from the trail. The most northwesterly boundary is 12 miles from the NHT. This portion of the SDNM, as well as most of its northeasterly boundary (largely defined by the Pipeline Road), is atypical of the cultural and natural values for which the SDNM was created. There is no identifiable rationale for this area to be closed to shooting. The Draft Plan does not explain what values for which the SDNM was designated that these lands along the pipeline road hold that demand closure to continued use by recreational shooters.

With respect to the NHT itself, on page 3-69, the Draft Plan states that *“Certain segments of the NHT that traverse the planning area are considered to be among the best preserved corridor segments and most representative of the historic trail corridor conditions.”* Yet in other places in the Draft Plan, it says that there are no known physical remains or surviving trail signature in the SDNM (page 3-7). Thus, it makes no sense to close the most northwesterly boundary of the NHT RMZ to recreational shooting. The only effect of closing the lands within the NHT RMZ is to close accessible and traditional sites that have been used for decades by recreational shooters. Keeping those lands open would not compromise protection of the NHT given the distance of the shooting sites from the most northerly boundary of the NHT RMZ.

As a final note, the map on page 3-12 shows that there is desert tortoise habitat within the boundary we have described as arbitrary. From what we can assess, it appears that the tortoise habitat acreage that may be involved in this desirable recreational shooting areas is a fraction of a percent of the Category I habitat, and represents an infinitesimal amount of the total tortoise habitat in the SDNM.

Recommendation: That Alternative C be amended to open for recreational shooting that area described as the northwesterly finger of the NHT RMZ and that the amended Alternative C be adopted as the Target Shooting Plan for the SDNM.

Alternative D would close designated wilderness lands, lands managed to protect wilderness characteristics, and the RMZ. The closure is sweeping in nature resulting in 320,317 acres or 66% of the SDNM that would be closed to recreational shooting. There is nothing in the Wilderness Act or in the BLM Manual 6340 – Management of BLM Wilderness that prohibits recreational shooting from taking place in designated wilderness and lands managed to protect wilderness characteristics. Because recreational shooting generally takes place in areas accessible by roads, it is unlikely that this activity will have a measureable impact. In fact, in the section titled “Environmental Consequences - Analytical Assumptions”, page 4-2, the Draft Plan references the furthest shooters will travel for their activity (one hour) and their dependency on vehicular access to shooting areas. This underscores the fact that the majority of recreational shooting is site dependent and is relatively uncommon in wilderness areas where it has minimal impact.

Absent significant, definable impacts and an inability to mitigate those impacts, there is no justification to support Alternative D. Our comments regarding the RMZ are noted above in Alternative C. Therefore, we strongly oppose Alternative D.

Alternative E would close the entire SDNM to recreational shooting. The BLM has used monument designation in other areas of the state to close lands designated as national monuments to recreational shooting where this activity has been a historic use of those lands. Rather than allowing recreational shooting to continue at a few sites that had been traditionally used by shooters that had good access and provided, or could have provided with improvements, safe shooting experiences, the BLM chose to close those monuments entirely, and nearly did the same with the SDNM. We were very pleased that the BLM took the public comments received on the SDNM draft resource management plan (RMP) to reevaluate its intent to close the SDNM to recreational shooting.

However, swinging the pendulum in the complete opposite direction by leaving the SDNM entirely open to recreational shooting was not supported by our organizations who are participants with the BLM in the Federal Lands Hunting, Fishing and Shooting Sports Roundtable (Roundtable). As noted in our comments regarding Alternative A, we fully understand the balance that has to be made in any planning area for the management of diverse recreational pursuits, visitor safety, and protection of resources and facilities. Alternative E would again reverse course and support the direction of the original RMP and is not supported by the facts and analyses in the Draft Plan. We strongly oppose Alternative E.

There are other aspects of the Draft Plan that we would like to briefly comment on.

Appendix B Monitoring and Mitigation attempts to develop an impact identification protocol to determine the acreage of permissible cumulative impacts. It is our understanding that this protocol had not been tested prior to the development of the Draft Plan and its release. Because this is a new concept in our planning lexicon it is difficult to determine how this information could be used or abused and whether these measures are designed to affect the closure of lands open to recreational shooting.

As you may be aware, non-governmental participants on the Roundtable have worked over the years with the BLM in promoting stewardship of our public lands. We implemented, in partnership with Tread Lightly! the Respected Access is Open Access outdoor ethic education campaign. We fully support the objectives of the Education and Outreach section of Appendix B that seeks to expand the Respected Access campaign, and we fully support its component parts. Many of our organizations have and continue to support volunteer clean up events that the BLM sponsors and we look forward to working with the BLM in a partnership to keep important sites for recreational shooting in the SDNM open and accessible, and that all recreationists respect their public lands by exercising good judgment, behavior and stewardship.

Recommendation: That the Draft Plan include information about the Roundtable partnership and its efforts to assist BLM and its state partners and other stakeholders in keeping public lands open for traditional and long-standing recreational activities of hunting and shooting.

The Draft Plan states on page 2-19 in discussing “Alternatives Considered but Eliminated from Further Study” that the BLM rejected the opportunity to designate target shooting areas “because designated recreational target shooting areas are inconsistent with the Monument proclamation and conflict with current BLM policy.” A thorough review of the proclamation does not reveal any statement that specifically precludes the BLM from designating shooting areas. Rather, it is the BLM’s unwritten policy executed in recent years agency-wide that prohibits designating shooting areas on any public lands, monument designated or not, even if such designation or identification would assist in promoting safe

and responsible shooting and reducing user conflicts. In fact, we believe it fair to say that not designating such areas actually exacerbates conflict with other uses and poses a barrier to constructive working relationships that could result in proactive and positive management of recreational shooting to everyone's benefit.

Recommendation: That the BLM restate that the reason for not considering designating shooting areas as an alternative is because of BLM policy, not monument proclamation.

In the section on "Hazardous Materials and Public Safety; Recreational Target Shooting" pages 3-73, the Draft Plan notes that alkaline soil conditions typical of the SDNM generally prevent any subsurface migration of metals. This is consistent with EPA's statements about lead migration in its document entitled *Best Management Practices for Lead at Outdoor Shooting Ranges* (EPA-902-B-01-001). Reference is made to sampling soils at 15 shooting sites in the SDNM and the fact that lead and arsenic were found exceeding threshold levels in some samples. Without knowing the location of the 15 sites and where the thresholds were exceeded, we have no ability to assess the information relative to the purpose of the draft environmental impact statement (DEIS). We also do not know if benchmark samples were taken of nearby similar soils undisturbed by bullets.

Recommendation: That more explicit information is provided about the soil samples taken.

In closing, the undersigned support the BLM's preferred alternative, Alternative C, ONLY if it is amended to exclude the northwesterly section of the NHT RMZ that contains accessible and popular shooting sites that have existed for years. We believe that retaining these sites not only allows continued use of an already impacted area, and maintains the all-important access necessary to make recreational enjoyment of safe shooting attainable in the SDNM, and it will not impact the NHT, or any of the other objects and values for which the SDNM was created.

Thank you for the opportunity to comment.

Arizona Chapter of the Public Lands Foundation

Boone and Crockett Club

Congressional Sportsmen's Foundation

Council to Advance Hunting and the Shooting Sports

Mule Deer Foundation

National Rifle Association

National Shooting Sports Foundation

Safari Club International

Wildlife Management Institute

From: [Recce, Susan](#)
To: ["joshua.campbell@sol.doi.gov"](mailto:joshua.campbell@sol.doi.gov)
Subject: FW: Eastern Lake Mountain target shooting closure
Date: Friday, November 17, 2017 10:29:35 AM
Attachments: [Comments on Eastern Lake Mountains Target Shooting Plan Amendment.docx](#)

Hi Josh,

See exchange of emails below. What I wrote Ben summarizes the comments that NRA and several other NGOS collectively submitted to the BLM (see attached).

Susan

From: Recce, Susan
Sent: Friday, November 03, 2017 9:10 AM
To: 'Benjamin Cassidy' <benjamin_cassidy@ios.doi.gov>; Keane Larry <lkeane@nssf.org>; Rothwell Patrick <prothwell@nssf.org>; Crane Jeff <jeff@sportsmenslink.org>; Butler Mitch <mitchbutler@naturalresourceresults.com>; Williams Michael E. <Mike.Williams@btlaw.com>; Andy Treharne <Andy@sportsmenslink.org>
Subject: RE: East Lake closure (not eagle mountain)

Hi Ben,

Attached are the comments that NRA, CSF, NSSF and others collectively sent in 2016 to the BLM on its draft target shooting plan amendment, following comments the previous year during the scoping phase of the plan amendment.

The BLM's announcement of October 19, 2017 describes the agency's action correctly. This is a target shooting closure action, and not a target shooting "plan". You will see in our comments that we criticized the BLM for not developing a recreation area management plan that would have addressed the reality that target shooting was "increasing dramatically" (BLM's words) and the need to analyze the "carrying capacity" of the public lands in balance with other recreation and resource protection needs. This was not undertaken. As our letter of comments stated, "It appears the BLM's intent is not to manage shooting, but to take the easy route, which is incremental closures" of public lands to shooting.

BLM's announcement also states that "The rule simply establishes a rule of conduct for public recreational use of specific public lands in the Eastern Lake Mountains..." To the contrary, this is not a rule about conduct, it is a rule about land closure.

BLM's preferred alternative was to extend the existing 900-acre closure to an additional 2,557 acres of public land. The announcement says that a total of 2,004 acres will be closed, which is certainly less than the draft proposal of 3,450 acres. However, regardless of the reduction in the number of acres to be closed, the plan is a plan for closure, not a plan for target shooting management. As our comments explain, approaching issues associated with dispersed shooting in this manner sets the

stage for future closures.

BLM's announcement says that the shooting sports communities have expressed concerns about the potential loss of a popular target shooting area. Indeed this is the case. BLM follows that statement by saying that it did not receive any protests. By protests, it means that no one filed a formal protest. That is not surprising. Speaking from experience, It is a waste of time. The scales tip to the judgment of the agency on land management decisions unless some grievous error in following NEPA or other federal laws is discovered. Just because no protests were filed does not mean the agency's decision is sound, and that certainly applies to Eastern Lake Mountains.

I appreciate your reaching out to us,
Susan

From: Benjamin Cassidy [mailto:benjamin_cassidy@ios.doi.gov]
Sent: Thursday, November 02, 2017 12:47 PM
To: Keane Larry <keane@nssf.org>; Rothwell Patrick <prothwell@nssf.org>; Crane Jeff <jeff@sportsmenslink.org>; Recce, Susan <SRecce@nrahq.org>; Butler Mitch <mitchbutler@naturalresourceresults.com>; Williams Michael E. <Mike.Williams@btlaw.com>
Subject: Fwd: East Lake closure (not eagle mountain)

Are you all aware of this? Please share any concerns or insights. Thank you. Ben

Please note all emails sent and received are subject to the Freedom of Information Act

Sent from my iPhone

Begin forwarded message:

From: "Hammond, Casey" <casey_hammond@ios.doi.gov>
Date: November 2, 2017 at 12:22:50 PM EDT
To: "Cassidy, Benjamin" <benjamin_cassidy@ios.doi.gov>
Subject: East Lake closure (not eagle mountain)

Hey Ben,

Attached is the briefing paper on the closure I mentioned.

Thanks for your help.

Casey

Comments on Eastern Lake Mountains Target Shooting Plan Amendment

May 27, 2016

Bureau of Land Management
Salt Lake Field Office
3370 South Decker Lake Boulevard
West Valley City, Utah 84119

Dear Bureau of Land Management (BLM):

The Undersigned appreciate the opportunity to comment on the proposed target shooting plan amendment (plan amendment) to the Pony Express Resource Management Plan. These comments follow those that we submitted to the BLM in August 2015 during the scoping phase of the plan amendment and the discussions that took place earlier that year with the Salt Lake Field Manager.

As noted previously, our organizations have a long-standing and vested interest in access and opportunities on federal public lands for our members to enjoy hunting and recreational shooting. This vested interest led our organizations to sign the Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU) in 2006 with the BLM. The purpose of the MOU is to build a partnership “for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal lands.” The MOU was renewed in 2014 between four federal agencies and 43 hunting, fishing, wildlife conservation and shooting sports organizations.

The Eastern Lake Mountains plan amendment offers three management alternatives. Alternative A would allow the current 893-acre temporary closure to expire and implement no other target shooting restrictions. Alternative B would make the current closure permanent. Alternative C would extend the area of closure to encompass a total of 3,450 acres.

The environmental assessment (EA) states that 893-acre temporary closure was implemented to provide safety for adjacent landowners and to provide protection for Historic Properties, specifically petroglyphs. The EA states that the area is “not conducive to safe target shooting” because the topography is flat terrain with no natural backstops, the number of visitors continues to increase, a highway is present, and there are homeowners in the vicinity.

The EA addresses wildfires and notes that shooter-related wildfires have been reduced as a result of prohibitions or restrictions on the use of steel core and steel jacketed ammunition, the use of tracer or incendiary ammunition, and the possession or use of any kind of explosives, incendiary or chemical devices, pyrotechnics or fireworks, or exploding targets. In order to reduce trash left behind by shooters, there are restrictions on the type of targets allowed, “which are reasonably restricted to those that are specifically designed and sold for target shooting.”

Our organizations are fully aware that in order to balance the agency’s management responsibilities to protect natural and cultural resources and to provide for an array of recreational opportunities, closures may be appropriate. We believe that the EA has established sufficient justification to make the

temporary closure permanent, as proposed in Alternative B. What we do not agree with is Alternative C, the BLM's preferred alternative, which would extend the closure order to an additional 2,557 acres.

The Federal Register notice of 12/15/2014 that extended the temporary closure of the 893 acres for an additional two years noted that "Prior to the 2012 closure, the Lake Mountains received about 4,000 target shooters each month; and on weekends, as many as 400 shooters concentrated into 5 areas, and other dispersed locations." A BLM power point presentation noted that 20-50,000 target shooters recreate on these public lands every year. The EA clearly states that target shooting is "increasing dramatically" and that "the carrying capacity for any recreational activity is an analysis that would be addressed in a recreation area management plan." The narrow approach that the BLM has taken with this EA is perplexing in light of the statement above. The logical approach would have been to conduct such an analysis in the first place, and then develop a recreation area management plan based on the findings.

The objective of Alternative C is to "emphasize resource protection while maximizing public health and safety." That statement is in conflict with the justification for Alternative B, which states that the temporary closure was designed for public safety by moving shooters out of an area that by its topography was not safe for shooting. It implies that the concern for public health and safety was satisfied. Further addressing health and safety can only be justified through the development of a recreation area management plan, which the BLM intends not to do. Within that matrix, such a plan would evaluate the carrying capacity for recreational shooting (as noted in the above paragraph) in balance with other recreational needs, resource protection needs, the high demand for places to shoot and the degree to which the Soldier Pass Shooting Range could meet some of that demand.

With reference to the Soldier Pass Shooting Range, the BLM acknowledges that the range will not be able to fully accommodate the growing need for places to shoot and correctly cites this as a reason to keep public lands open. The logical approach, then, would be to wait until the agency and the County can evaluate the degree to which the shooting range is able to relieve the pressure for recreational shooting opportunities before contemplating closures beyond the exiting temporary closure of 893 acres. If Alternative C is adopted, we will never know if the combination of opening a county-operated shooting range and making the temporary closure order permanent (Alternative B) was adequate to address the public health and safety and resource protection issues that, according to the BLM, necessitated the process in the first place. The BLM can always evaluate the need for future closures at a later date based on far more accurate information and justification than is provided in Alternative C. The likelihood of BLM reopening areas that it would close under Alternative C if proved unnecessary is remote.

A recreation area management plan is what the BLM should be aiming for. Instead, the agency's response to shooting-related issues is to close more lands to shooting, which will likely increase and spread the problems by pushing displaced shooters into the areas that remain open. The same excuses could then be easily used down the road to close the entire planning area to recreational shooting after the Soldier Pass Shooting Range is up and running.

Notwithstanding the increasing recreational use pressure, the BLM's approach with this EA to keep it narrowly focused on public safety and resource protection is short sighted. It appears the BLM's intent is not to manage shooting but to take the easy route, which is incremental closures. Adding another 2,557 acres to the closure and talking about a recreation plan some point in the future is an easy administrative out.

A Salt Lake Tribune article dated April 7, 2016 entitled “BLM Transfers public Lands to Utah County, Parcel to be Used as a Shooting Range” in reference to the 160-acre transfer to public land to Utah County states that shooting related issues have “pushed state and federal land managers to close some lands to shooting and develop a plan to manage target shooting.” The writer was misinformed, as the plan amendment is not a plan to manage target shooting. Instead, it is a plan to close lands to shooting and transfer to Utah County the responsibility of providing opportunities for recreational shooting.

The BLM PowerPoint presentation under the heading *Public Safety Concerns* noted the need for safe shooting locations, but the EA dismisses identifying such locations as being outside the scope of the EA. The BLM’s preferred solution is to close an additional 2,557 acres rather than developing a recreation area management plan that could specifically identify those locations where recreational shooting would be a high safety risk. It should be noted that the EA says that “The public land user has the responsibility of locating safe and accessible areas in which to target shoot on BLM administered public lands.” That is not wise and acceptable management of a legitimate recreational activity on public lands.

Even the *Notice to Interested Party* dated July 2015 announcing the start of the planning process to amend the 1990 Pony Express Resource management Plan stated that the existing “RMP decisions related to management of recreational target shooting and resources affected by this activity are no longer adequate in this area” and that the BLM was seeking public input to help identify issues, impacts and alternatives that should be addressed in this amendment. The letter further stated that with the implementation of the temporary target shooting closure in 2012, “new and increased impacts and threats are now occurring in the areas into which the displaced target shooters have moved.”

In light of the obvious need for a recreation area management plan, the EA pointedly does not address any management decisions for recreational shooting other than expanded shooting closures. All other recommendations, such as identifying safe shooting areas, were dismissed as being outside the scope of the EA, which is narrowly focused on public safety and resource protection, and not target shooting management.

Under the rationale for supporting Alternative C, the EA states that “By displacing target shooting from the closure area into previously under-utilized portions of the Planning Area, the negative cumulative impacts associated with Alternative A may become apparent in those places.” There is likely not another statement in the entire EA that can advocate more forcefully for the development of a recreation area management plan instead of the piece meal closure approach that the BLM is taking in East Mountain Lakes. Why is such a narrow approach being taken in light of the broad management challenges that are described in the EA? Was this narrow approach a decision made by the Field Office or is it a result of direction at a higher level in the agency?

The management approach is a closure approach. First, the BLM closes nearly 900 acres for public safety and cultural resource protection. The EA notes that the closure “funnels displaced target shooters to specific, easily patrolled locations along the power line road west toward the Lake Mountains hillsides, which creates a de facto safety zone for law enforcement officers patrolling the area.” But the result was that the closure pushed the displaced shooters into areas where “many petroglyphs are located.” Thus the temporary closure did not meet the BLM’s objectives of protecting cultural resources.

Next, the EA states that problems associated with shooting like the use of inappropriate targets, micro trash and target shooting related wildfires have followed displaced shooters from the area under temporary closure into the area that is proposed for additional closure in Alternative C. So now under this EA, the plan is to follow the model of the temporary closure by extending the closure to additional areas, thus displacing shooters to other BLM public lands with the possibility of the same issues following displaced shooters. It is a scenario that suggests more public land closures down the road. What should have occurred from the beginning was the development of a recreation area management plan. The undersigned strongly support this approach and an end to the management by creeping closures.

During discussions with the Field Office Manager last year, we were told that the BLM worked with local interest groups to install a protective buck and pole fence along an existing powerline and that signs were installed to let shooters know of the presence of cultural resources in the area. The BLM indicated in an email to the MOU Roundtable Chair that the buck and pole fences with signs seeking voluntary compliance were used with great success. Yet, nothing in the EA speaks to the construction of the fence nor its effectiveness in protecting cultural resources, nor the work of private sector partners. Instead the EA justifies the adoption of BLM's preferred Alternative C by stating that the temporary closure is not effective because it channels shooters into other areas where there are petroglyphs. It cannot be both ways.

In the EA, the BLM noted the help of volunteers in cleaning up trash left behind by shooters, but also that left by people dumping their household refuse. The BLM notes that in spite of volunteer efforts, clean ups are still costly and use a lot of staff time. BLM asked about contacting local shooting groups to help keep the areas clean. We know that BLM has been in contact with the Utah Shooting Sports Council and would imagine that the Council is in an excellent position to directly partner with the BLM, or assist in locating local shooting enthusiasts who would welcome the opportunity to partner with the BLM in keep shooting sites clean. It is a far more positive and progressive approach than closing areas to recreational shooting.

With respect to law enforcement, the EA mentioned that after the temporary closure was put into effect, the Utah County Sheriff's Office and BLM law enforcement rangers began conducting regular patrols. It begs the question why the BLM-County partnership cannot be extended to the lands currently remaining open to recreational shooting. An area of just over 8,000 acres does not seem impossible to patrol. In fact, Alternative C indicates that patrols would take place in the additional areas proposed for closure, which would mean only 4,000 acres would remain. Certainly a law enforcement presence for all of the land within Eastern Lake Mountains would reduce problems associated with all recreational use and illegal dumping. There is no justification to use additional closures in order to achieve public safety and resource protection.

Lastly, with respect to spent lead ammunition, the EA says that the "potential long-term problem with shooting is the concentration of lead on public lands. Should it ever become necessary to remediate these areas, the cost of clean-up could be extensive. In the meantime, this contamination may present risks to the public and to wildlife." The EA provides no citations or evidence as to how spent lead ammunition could present a risk to the public and to wildlife in the planning area. It is an unscientific statement and appears to be designed to add as much negativity about recreational shooting as possible. If the BLM were to develop a recreational area management plan and identify

suitable, accessible areas of the public lands for recreational shooting, along with the support of shooters in conducting periodic clean up events, there is no reason to believe that the BLM would be facing some future remediation of these areas. We strongly recommend that the statement be removed.

In summary, the EA acknowledges the increasing popularity of recreational shooting and that the Soldier Pass Shooting Range is likely not to fully accommodate this popular sport, meaning that public land must remain open to this activity. Yet, the BLM has chosen to develop a closure plan under the narrow matrix of public safety and cultural resource protection, rather than have begun the development of a true and realistic management plan following the initial temporary closure of the 893 acres. The undersigned can support Alternative B, but are strongly opposed to the adoption of Alternative C.

Sincerely,

Congressional Sportsmen's Foundation

Council to Advance Hunting and the Shooting Sports

International Hunter Education Association - USA

Mule Deer Foundation

National Rifle Association

National Shooting Sports Foundation

Safari Club International

Wildlife Management Institute

From: [Campbell, Joshua](#)
To: [Recce, Susan](#)
Cc: [Cassidy, Benjamin](#); [Jorjani, Daniel](#)
Subject: Re: Comments on SDNM recreational shooting plan
Date: Friday, November 17, 2017 11:20:18 AM

Thanks, Susan! I will look into it and we can discuss after Thanksgiving.

On Fri, Nov 17, 2017 at 10:29 AM, Recce, Susan <SRecce@nrahq.org> wrote:

Josh,

See exchange of emails. When I talked to Ben about this last month, I had the feeling that the Secretary's office was not going to pursue the concerns that the NRA and other NGOs raised in our comments (attached). We proposed modifying BLM's preferred planning alternative (Alternative C). BLM was under court order to get this shooting plan done by a certain date and, not surprising to me, the agency ran up to the deadline (supposedly the judge would not extend the timeframe) giving the Secretary's office no time to evaluate BLM's decision against the comments we submitted.

Susan

From: Recce, Susan
Sent: Thursday, October 05, 2017 5:51 PM
To: 'benjamin_cassidy@ios.doi.gov' <benjamin_cassidy@ios.doi.gov>
Subject: FW: Comments on SDNM recreational shooting plan

Hi Ben,

I am so happy for you. I think you will find the experience very rewarding. Will Tim Williams be reporting to you? A longtime friend of mine Jim Cason is an assistant Deputy Secretary and when you see him, please give him my regards.

Attached is the comment letter I sent in February. You will see in paragraph 2 that we want a modified Alternative C. Let me know if you have any questions on that. Also below is the BLM staffer we asked for those comments last month.

Best to you!!

Susan

From: Recce, Susan
Sent: Thursday, September 07, 2017 10:52 AM
To: 'cyounger@blm.gov' <cyounger@blm.gov>
Subject: Comments on SDNM recreational shooting plan

Hi Calle,

Attached are the comments the NRA and other NGOs that participate on the Federal Lands Hunting and Shooting Sports Roundtable sent to the BLM last February. As you may know, the Roundtable was created by a MOU signed by 42 national hunting, fishing, wildlife conservation and shooting sports organizations and the BLM, USFS, USFWS, USACE, with the NPS as ad hoc. The fishing interests do not participate on the Roundtable as they chose to work with the MOU Federal partners in a different forum.

Let me know if you have any questions.

Susan Recce

Director

Conservation, Wildlife and Natural Resources

Institute for Legislative Action

National Rifle Association

From: [Recce, Susan](#)
To: ["Campbell, Joshua"](#)
Subject: RE: Hey!
Date: Wednesday, November 22, 2017 10:37:33 AM

Hi Josh,

Is there a chance through the Secretary's office that you could get me a parking pass for next Wednesday for the parking lot of the South Building....the one across C Street from DOI. I think Bureau of Mines is in that building. I've parked there in the past. If it is allowed, I would need to provide the make and model of my vehicle.

Thanks,
Susan

From: Campbell, Joshua [mailto:joshua.campbell@sol.doi.gov]
Sent: Friday, November 17, 2017 9:55 AM
To: Recce, Susan <SRecce@nrahq.org>
Subject: Hey!

Let's do lunch?

From: [Joshua Campbell](#)
To: [Recce, Susan](#)
Subject: Re: Hey!
Date: Wednesday, November 22, 2017 2:12:07 PM

I will request one.

Sent from my iPhone

On Nov 22, 2017, at 10:37 AM, Recce, Susan <SRecce@nrahq.org> wrote:

Hi Josh,

Is there a chance through the Secretary's office that you could get me a parking pass for next Wednesday for the parking lot of the South Building....the one across C Street from DOI. I think Bureau of Mines is in that building. I've parked there in the past. If it is allowed, I would need to provide the make and model of my vehicle.

Thanks,
Susan

From: Campbell, Joshua [<mailto:joshua.campbell@sol.doi.gov>]
Sent: Friday, November 17, 2017 9:55 AM
To: Recce, Susan <SRecce@nrahq.org>
Subject: Hey!

Let's do lunch?

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Re: Hey!
Date: Wednesday, November 22, 2017 2:15:26 PM

Thanks!

Happy Thanksgiving, Josh.

Susan

From: Joshua Campbell <joshua.campbell@sol.doi.gov>
Sent: Wednesday, November 22, 2017 2:12 PM
To: Recce, Susan
Subject: Re: Hey!

I will request one.

Sent from my iPhone

On Nov 22, 2017, at 10:37 AM, Recce, Susan <SRecce@nrahq.org> wrote:

Hi Josh,

Is there a chance through the Secretary's office that you could get me a parking pass for next Wednesday for the parking lot of the South Building....the one across C Street from DOI. I think Bureau of Mines is in that building. I've parked there in the past. If it is allowed, I would need to provide the make and model of my vehicle.

Thanks,
Susan

From: Campbell, Joshua [<mailto:joshua.campbell@sol.doi.gov>]
Sent: Friday, November 17, 2017 9:55 AM
To: Recce, Susan <SRecce@nrahq.org>
Subject: Hey!

Let's do lunch?

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Parking
Date: Tuesday, November 28, 2017 12:18:20 PM

Hi Josh,
Checking in to see if a parking spot might be available for tomorrow.
Thanks,
Susan

Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Parking
Date: Tuesday, November 28, 2017 12:18:41 PM

Hi Josh,
Checking in to see if a parking spot might be available for tomorrow.
Thanks,
Susan

Sent from my iPhone

From: [Campbell, Joshua](#)
To: [Recce, Susan](#)
Subject: Re: Parking
Date: Tuesday, November 28, 2017 1:45:54 PM

Susan, I was told that because of on-going construction, we have not been validating parking there.

On Tue, Nov 28, 2017 at 12:18 PM, Recce, Susan <SRecce@nrahq.org> wrote:

Hi Josh,
Checking in to see if a parking spot might be available for tomorrow.
Thanks,
Susan

Sent from my iPhone

From: [Recce, Susan](#)
To: ["Campbell, Joshua"](#)
Subject: RE: Parking
Date: Tuesday, November 28, 2017 1:46:58 PM

OK. Thanks for asking.

From: Campbell, Joshua [mailto:joshua.campbell@sol.doi.gov]
Sent: Tuesday, November 28, 2017 1:45 PM
To: Recce, Susan <SRecce@nrahq.org>
Subject: Re: Parking

Susan, I was told that because of on-going construction, we have not been validating parking there.

On Tue, Nov 28, 2017 at 12:18 PM, Recce, Susan <SRecce@nrahq.org> wrote:

Hi Josh,
Checking in to see if a parking spot might be available for tomorrow.
Thanks,
Susan

Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Arriving at 12:45 C st entrance
Date: Wednesday, November 29, 2017 12:37:06 PM

Hi Josh,
Just letting you know I am arriving a little early.
Susan

Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Arriving at 12:45 C st entrance
Date: Wednesday, November 29, 2017 12:45:21 PM

Hi Josh,
Just letting you know I am arriving a little early.
Susan

Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Heading out to NRA
Date: Wednesday, November 29, 2017 1:28:58 PM

It appears I was mistaken on date/time for lunch meeting. I had it on the schedule for today at 1pm. I am heading out to NRA headquarters. Maybe we can have a conversation on BLM issues via phone. My office is 703 267 1541 and cell is (b) (6)
Susan

Sent from my iPhone

From: [Joshua Campbell](#)
To: [Recce, Susan](#)
Subject: Re: Heading out to NRA
Date: Wednesday, November 29, 2017 1:40:46 PM

Wednesday after 2:30 or Friday?

Sent from my iPhone

> On Nov 29, 2017, at 1:29 PM, Recce, Susan <SRecce@nrahq.org> wrote:

>

> It appears I was mistaken on date/time for lunch meeting. I had it on the schedule for today at 1pm. I am heading out to NRA headquarters. Maybe we can have a conversation on BLM issues via phone. My office is 703 267 1541 and cell is (b) (6).

> Susan

>

> Sent from my iPhone

From: [Joshua Campbell](#)
To: [Recce, Susan](#)
Subject: Re: Heading out to NRA
Date: Wednesday, November 29, 2017 9:39:21 PM

Susan, I'm not sure the below went through today because I sent it while in the Metro station.

I can do Wednesday after 2:30 or Friday anytime, next week. I look forward to meeting you!

Best regards,

Josh

Sent from my iPhone

> On Nov 29, 2017, at 1:29 PM, Recce, Susan <SRecce@nrahq.org> wrote:

>

> It appears I was mistaken on date/time for lunch meeting. I had it on the schedule for today at 1pm. I am heading out to NRA headquarters. Maybe we can have a conversation on BLM issues via phone. My office is 703 267 1541 and cell is (b) (6).

> Susan

>

> Sent from my iPhone

From: [Recce, Susan](#)
To: ["Joshua Campbell"](#)
Subject: RE: Heading out to NRA
Date: Friday, December 1, 2017 10:18:46 AM

Do you still want to come out to NRA hdqt? Wednesday after 2:30 works best. Friday in the afternoon works also.
Thanks, Josh
Susan

-----Original Message-----

From: Joshua Campbell [<mailto:joshua.campbell@sol.doi.gov>]
Sent: Wednesday, November 29, 2017 9:39 PM
To: Recce, Susan <SRecce@nrahq.org>
Subject: Re: Heading out to NRA

Susan, I'm not sure the below went through today because I sent it while in the Metro station.

I can do Wednesday after 2:30 or Friday anytime, next week. I look forward to meeting you!

Best regards,

Josh

Sent from my iPhone

> On Nov 29, 2017, at 1:29 PM, Recce, Susan <SRecce@nrahq.org> wrote:

>

> It appears I was mistaken on date/time for lunch meeting. I had it on the schedule for today at 1pm. I am heading out to NRA headquarters. Maybe we can have a conversation on BLM issues via phone. My office is 703 267 1541 and cell is (b) (6).

> Susan

>

> Sent from my iPhone

From: [Joshua Campbell](#)
To: [Recce, Susan](#)
Subject: Re: Heading out to NRA
Date: Friday, December 1, 2017 10:24:30 AM

Let's do Wednesday at 3? If that works, I'll see you then.

Sent from my iPhone

> On Dec 1, 2017, at 8:18 AM, Recce, Susan <SRecce@nrahq.org> wrote:
>
> Do you still want to come out to NRA hdqt? Wednesday after 2:30 works best. Friday in the afternoon works also.
> Thanks, Josh
> Susan
>
> -----Original Message-----
> From: Joshua Campbell [<mailto:joshua.campbell@sol.doi.gov>]
> Sent: Wednesday, November 29, 2017 9:39 PM
> To: Recce, Susan <SRecce@nrahq.org>
> Subject: Re: Heading out to NRA
>
> Susan, I'm not sure the below went through today because I sent it while in the Metro station.
>
> I can do Wednesday after 2:30 or Friday anytime, next week. I look forward to meeting you!
>
> Best regards,
>
> Josh
>
> Sent from my iPhone
>
>> On Nov 29, 2017, at 1:29 PM, Recce, Susan <SRecce@nrahq.org> wrote:
>>
>> It appears I was mistaken on date/time for lunch meeting. I had it on the schedule for today at 1pm. I am heading out to NRA headquarters. Maybe we can have a conversation on BLM issues via phone. My office is 703 267 1541 and cell is (b) (6).
>> Susan
>>
>> Sent from my iPhone

From: [Recce, Susan](#)
To: ["Joshua Campbell"](#)
Subject: RE: Heading out to NRA
Date: Friday, December 1, 2017 10:27:54 AM

OK. Look forward to it. We can get something to drink/eat in the café and visit there if you wish.
Susan

-----Original Message-----

From: Joshua Campbell [<mailto:joshua.campbell@sol.doi.gov>]
Sent: Friday, December 01, 2017 10:24 AM
To: Recce, Susan <SRecce@nrahq.org>
Subject: Re: Heading out to NRA

Let's do Wednesday at 3? If that works, I'll see you then.

Sent from my iPhone

> On Dec 1, 2017, at 8:18 AM, Recce, Susan <SRecce@nrahq.org> wrote:
>
> Do you still want to come out to NRA hqdt? Wednesday after 2:30 works best. Friday in the afternoon works also.
> Thanks, Josh
> Susan
>

> -----Original Message-----

> From: Joshua Campbell [<mailto:joshua.campbell@sol.doi.gov>]
> Sent: Wednesday, November 29, 2017 9:39 PM
> To: Recce, Susan <SRecce@nrahq.org>
> Subject: Re: Heading out to NRA
>

> Susan, I'm not sure the below went through today because I sent it while in the Metro station.
>

> I can do Wednesday after 2:30 or Friday anytime, next week. I look forward to meeting you!
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> Best regards,
>

> Josh
>

> Sent from my iPhone
>

>> On Nov 29, 2017, at 1:29 PM, Recce, Susan <SRecce@nrahq.org> wrote:
>>

>> It appears I was mistaken on date/time for lunch meeting. I had it on the schedule for today at 1pm. I am heading out to NRA headquarters. Maybe we can have a conversation on BLM issues via phone. My office is 703 267 1541 and cell is (b) (6).

>> Susan
>>

>> Sent from my iPhone

From: [Joshua Campbell](#)
To: [Microsoft Outlook](#); SRecce@nrahq.org
Subject: NRA visit 3:00
Date: Friday, December 1, 2017 2:56:37 PM

Copy--thanks!

Sent from my iPhone

On Dec 1, 2017, at 12:10 PM, Microsoft Outlook <postmaster@doi.gov> wrote:

Delivery has failed to these recipients or groups:

[Recce, Susan \(SRecce@nrahq.org\)](#)

The server has tried to deliver this message, without success, and has stopped trying. Please try sending this message again. If the problem continues, contact your helpdesk.

Diagnostic information for administrators:

Generating server: smtp21.doi.gov

SRecce@nrahq.org

#550 4.4.7 QUEUE.Expired; message expired ##

Original message headers:

Received: from smtp3.smqd.doi.gov (10.10.82.13) by smtp21.doi.gov (10.10.134.11) with Microsoft SMTP Server (TLS) id 14.3.361.1; Wed, 29 Nov 2017 12:41:06 -0600
DKIM-Signature: v=1; a=rsa-sha256; d=sol.doi.gov; s=mail; c=relaxed/simple; q=dns/txt; i=i@sol.doi.gov; t=1511980847;
h=From:Sender:Reply-To:Subject:Date:Message-ID:To:Cc:MIME-Version:Content-Type:Content-Transfer-Encoding:Content-ID:Content-Description:Resent-Date:Resent-From:Resent-Sender:Resent-To:Resent-Cc:Resent-Message-ID:In-Reply-To:References:List-Id:List-Help:List-Unsubscribe:List-Subscribe:List-Post:List-Owner:List-Archive; bh=g1KAVdjGQVeumPTxEfMaDVDZ/tCXx6HxufIFqhh5G3A=; b=TbvYDuzQogiYrLsK9b3xikptfncM1Rb681fZC5Ro6oRRGNRYdOowFrT2Q2EgEeYt9oNwwlkv455FM8EeYuPEDQeelpzFbA6cHosItzdV5SWzFoT4Cp49PkzVicVfmXgRLm7FkTsfQOR9uBltDqSMMdR0L0/JwCE7poDHzYYu/R0=;
X-AuditID: 0a0a520d-c4dff70000001cf7-a6-5aleff2fbal7
Received: from gsmt21.doi.gov ([10.10.134.15]) (using TLS with cipher ECDHE-RSA-AES256-SHA (256/256 bits)) (Client did not present a certificate) by smtp3.smqd.doi.gov (Hello) with SMTP id DD.1D.07415.F2FFE1A5; Wed, 29 Nov 2017 11:40:47 -0700 (MST)
Received: from mail-io0-f199.google.com (209.85.223.199) by gsmt21.doi.gov (137.227.134.15) with Microsoft SMTP Server (TLS) id 14.3.361.1; Wed, 29 Nov 2017 12:47:10 -0600
Received: by mail-io0-f199.google.com with SMTP id n42so3589673ioe.12 for <SRecce@nrahq.org>; Wed, 29 Nov 2017 10:40:46 -0800 (PST)
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=le100.net; s=20161025; h=x-gm-message-state:from:mime-version:references:in-reply-to:date:message-id:subject:to; bh=rbJUETlnfnGKo8hU5QxrhrYuxPcCXMRrvleJ4Cfjjc=; b=a/o0jz568yp07snFaL+ViR6ub26rBTPYr0Zp93AsBloCptB5MzG4RYCM4uc2IHMtTzgZNRa6QdOelXjSaA18Kcz+uyVb4TY/79ZOZo+1U+4IvClgRo4k89bU8dhU6Gny6aPLc q+A2KR0Z/g95eb9Dt9afm7CDdQKd46qfbDrY27uRdqtMnR/Ze5tbkIjB+7ngJnVuo5P pszopkI6KClEyJWtUusyY135o/ejn+gXFdT6eBkPbJlrtk01XKFRtpt743rXahMdz7+W wVdRzH65gLN0ibhIQ5I8rV9oSzRk3jJxX9WIoWPYNXCAGrayPw/F+gbqK+3WRIdPuzAD 2bYA=
X-Gm-Message-State: AJaThX4XoLd6KD2qBRA1OtGo8yn1kB3z37Yj2Z7HKfyI1umNFCuI8Mw WUzyOLhYAGnbU8Rz/Vz9gVsvn7QciPFcq4K29kdt9xczCI0tx8mvznthDnFdBc6U8F5emYW7zm i0y62T+1SKTjVr1PMn+DmqSVew6DDj5ECsHxaugNhDo0B8RyDEMcV8ibLBkFUTq/ikQ1PuHqcy n1uL+cuV8yZDdrKTaxNVqTE61+

X-Received: by 10.107.37.141 with SMTP id l135mr4532062iol.104.1511980840917;
Wed, 29 Nov 2017 10:40:40 -0800 (PST)
X-Google-Smtp-Source:
AGS4zMaCO5GzBsNRetPelG0IWzRxSfTyiIsP8yGt9VrqhFniKMirWNdCSdrqNaJo8EJhQsGcfomZqJZOk8EgVZQD/k8=

X-Received: by 10.107.37.141 with SMTP id l135mr4531987iol.104.1511980839897;
Wed, 29 Nov 2017 10:40:39 -0800 (PST)
From: Joshua Campbell <joshua.campbell@sol.doi.gov>
MIME-Version: 1.0 (1.0)
References: <E52EE64B-BCC7-458D-B977-21314F1940B1@nrahq.org>
In-Reply-To: <E52EE64B-BCC7-458D-B977-21314F1940B1@nrahq.org>
Date: Wed, 29 Nov 2017 13:40:41 -0500
Message-ID: <4634969656771308600@unknownmsgid>
Subject: Re: Heading out to NRA
To: "Recce, Susan" <SRecce@nrahq.org>
Content-Type: text/plain; charset="UTF-8"
X-Gm-Spam: 0
X-Gm-Phishy: 0
Return-Path: joshua.campbell@sol.doi.gov
X-Filter-Loop: Reflected
X-Brightmail-Tracker:
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k8SF1xPZIZwNjBJ/XjaxQjg9jBIv3zSDORICi1kl1q18xQThtDJJ/GyZwdLFyAnklEjs/36G
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jWQRUJV40X03G0S5nsTlf3tYQWxhAXmJhodvmUFsEaCaM496mUBsZgFNidbtv6FO4JGYMvci
lM0nsebKFrCZQgIaEo3rD0GdLCLxcMUNlgmMYrOQXDQLyagFjEyrGIWKc0sKjPWKc9NT9FLy
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05LG5hlHwi7dVuR2vOeJEktXRqKhFnNRcSIA+ckB9HgCAAA=

<mime-attachment>

<mime-attachment>

From: [Recce, Susan](#)
To: joshua.campbell@sol.doi.gov
Subject: Refuge System policies
Date: Wednesday, December 6, 2017 5:21:34 PM
Attachments: [NRA comments on FWS Strategic Growth Policy for Refuge System.docx](#)

Josh,

Thanks so much for driving out to NRA and hopefully your inbound trip home will not be too painful. I truly appreciate the time you spent on BLM/FWS issues.

Attached are the comments I sent to FWS regarding the land acquisition policy for the Refuge System. As mentioned, Dan Ashe's rejection of including the "Big 6" in that policy was a springboard for my asking that all Refuge System policies be reviewed to determine if the "Big 6" should not be incorporated in the land acquisition policy and other Refuge System policies.

By separate email I will send you info on the possibility of developing a BLM wide policy for hunting, fishing and recreational shooting.

Best,
Susan

February 28, 2014

Sarena Selbo
Division of Natural Resources and Conservation Planning
National Wildlife Refuge System
US Fish and Wildlife Service
4401 North Fairfax Drive
Room 600A
Arlington, VA 22203

RE: Strategic Growth Policy

Dear Ms. Selbo:

The NRA appreciates the opportunity to comment on the Fish and Wildlife Service's (Service) draft policy on how to strategically grow the National Wildlife Refuge System (Refuge System).

Section 5.2 of the Strategic Growth Policy (Policy) cites the National Wildlife Refuge System Administration Act of 1966, as amended by the National Wildlife Refuge Improvement Act of 1997 (Improvement Act) as the authority for its development. The draft policy references the Refuge System's vision document *Conserving the Future: Wildlife Refuges and the Next Generation* that calls for the Service to ensure that future land protection efforts are based on "explicit priorities, rigorous biological planning and conservation design."

The vision document devotes 18 pages to the subject of hunting and fishing in its Recommendation 17. That recommendation calls for the Service to work with the state fish and wildlife agencies in cooperation with the Sport Fishing and Boating Partnership Council and the Wildlife and Hunting Heritage Conservation Council in order to increase quality hunting and fishing opportunities on national wildlife refuges.

Within Recommendation 17, the Service notes that in passing the Improvement Act:

Congress recognized the history and value of the use of wildlife to the American people and designated six wildlife-dependent recreational uses as priority public uses of the System – to be permitted when found to be safe and compatible with the legal purposes of individual refuges and the System mission. These uses which have no priority over one another, are to be afforded priority over all other public uses of the System.

As strong as the Service's statutory authority is under the Improvement Act to provide for priority public uses and the pledge of the Service to work with the states and the two Federal Advisory Councils to increase these public opportunities, there is no integration of priority public uses in the Policy. The priority public uses imbedded in the Improvement Act are neither in the Section 5.2 list

of the Policy's objectives nor in the Section 5.9 criteria that a project proposal must meet for the Director to consider an addition to the Refuge System, by acquisition or easement.

Although the Refuge System's mission statement does not explicitly refer to the priority public uses, it does state that the conservation, protection and enhancement of fish, wildlife and plants and their habitat is for the continuing benefit of the American people. Even though the priority public uses are not enshrined in the Refuge System's mission statement, they are enshrined in the Improvement Act itself from which the Service derives its authority to develop the Policy. Because the Improvement Act elevated the six wildlife-dependent recreational uses above and separate from all other public uses, they should be included in the objectives of the policy and the criteria for project proposals.

Further, the Service has acknowledged the importance of the human equation in land acquisitions and easements by establishing refuges in urban settings and making wildlife-dependent recreation a refuge purpose. An excellent example is the John Heinz National Wildlife Refuge at Tinicum with the city of Philadelphia in the background. The stated mission of the Refuge is "for the purpose of preserving, restoring, and developing the natural area as Tinicum March, to promote environmental education, and to afford visitors an opportunity to study wildlife in its natural habitat." This Refuge is not an isolated example of how the Refuge System is balancing the need to conserve and enhance wildlife and habitat with the need to provide benefits to people.

The Policy is short-sighted in not including the human equation in developing land acquisition and easement priorities. Acquisition and easement priorities cannot and should not be solely based on wildlife conservation and population objectives.

The NRA strongly recommends that the Policy be amended to bring it into conformance with the Improvement Act by including hunting, fishing and the other priority public uses in the list of the policy's objectives and criteria for prioritizing land acquisitions and easements. Certainly, many high priority land acquisitions and easements that support the Service's wildlife conservation mission can also provide benefits to the Refuge System's public constituency.

The Service needs the public's support in order to pursue land acquisition and easements and their attendant funding. It is crucial that priority public uses of the Refuge System be recognized and incorporated into this Policy.

Sincerely,

Susan Recce
Director
Conservation, Wildlife and Natural Resources

Cc: Wildlife and Hunting Heritage Conservation Council
Sport Fishing and Boating Partnership Council
Ron Regan, Executive Director, Association of Fish and Wildlife Agencies

From: [Recce, Susan](#)
To: joshua.campbell@sol.doi.gov
Subject: BLM shooting policy
Date: Wednesday, December 6, 2017 5:33:45 PM
Attachments: [WHHCC letter BLM rec shooting policy.pdf](#)
[letter on rec shooting.pdf](#)
[WHHCC BLM shooting sports letter Dec 2011.pdf](#)
[Scans17.pdf](#)

Josh,

The BLM draft policy which the agency intended to adopt without scrutiny from anyone outside the agency is in the document marked "scans". It is not dated, but you will see by the WHHCC letters that this took place 6 years ago. The letter dated 2011 contains WHHCC's comments to BLM on the draft policy. The other two WHHCC letters were attempts to engage the BLM in a dialogue about the withdrawn policy and efforts to develop a policy that the advisory council and the constituency it represented felt was a fair and balanced policy.

Susan

*Wildlife and Hunting Heritage
Conservation Council*

February 7, 2014

The Honorable Sally Jewell, Secretary
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

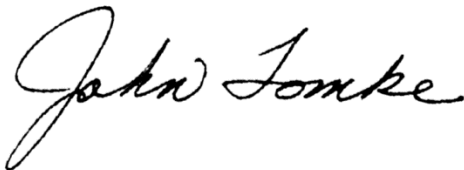
Secretary Jewell,

One of the duties of the Wildlife and Hunting Heritage Conservation Council (Council) is to provide the Secretaries of the Interior and Agriculture with recommendations regarding “appropriate access to Federal lands for recreational shooting and hunting.” Members of the Council are well versed and knowledgeable on the subject and they represent thousands of hunters and shooters who depend on Federal lands managed by the Bureau of Land Management (BLM) and the U.S. Forest Service for sighting-in hunting firearms and the enjoyment of target shooting. In 2011, the Council learned that the BLM was intending to implement a policy on recreational shooting. When the Council was briefed on the draft policy by the BLM, we raised concerns over the policy with your predecessor, Secretary Salazar. In response to the Council’s concerns, Secretary Salazar issued a memorandum on November 23, 2011 directing that no further action be taken to develop or implement the draft policy.

The Council believes that the BLM would benefit from a written policy since the management of public uses, including recreational shooting, should be guided by a national policy. Therefore, we respectfully request that the Salazar memorandum be withdrawn and that the BLM be allowed to resume development of a policy in cooperation with the Council. Thank you for your attention to this matter.

Lastly, I wanted to extend an invitation to join us – your advisory Council - at our summer meeting on June 17 and 18th in Cody, Wyoming just outside Yellowstone National Park.

Sincerely,



John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Cc:
Neil Kornze, BLM

CHAIRMAN
John Tomke
Ducks Unlimited

VICE CHAIRMAN
Christine Thomas
University of Wisconsin-Stevens Point

MEMBERS
M. David Allen
Rocky Mountain Elk Foundation

Jeffrey S. Crane
Congressional Sportsmen's Foundation

Robert R. Fithian
Alaska Professional Hunters
Association, Inc.

Thomas Franklin
Theodore Roosevelt Conservation
Partnership

Winifred B Kessler
The Wildlife Society

Robert Manes
The Nature Conservancy

Baasewe Frederick D. Maulson
Great Lakes Indian Fish and Wildlife
Commission

Tommy Millner
Cabela's

Robert Model
Boone and Crockett Club

Joanna Prukop
(former) New Mexico Secretary of
Energy, Minerals & Natural Resources

Stephen L. Sanetti
National Shooting Sports Foundation

Larry Schweiger
National Wildlife Federation

George C. Thornton
National Wild Turkey Federation

Howard K. Vincent
Pheasants Forever

Larry Voyles
Arizona Game and Fish Department

Steve Williams
Wildlife Management Institute

EX OFFICIO REPRESENTATION
Association of Fish and Wildlife Agencies
Bureau of Land Management
National Park Service
U.S. Fish and Wildlife Service
Farm Service Agency
U.S. Forest Service
Natural Resources Conservation Service

DESIGNATED FEDERAL OFFICER &
COORDINATOR
Joshua Winchell
U.S. Fish and Wildlife Service
Division of Program & Partnership
Support
4401 N. Fairfax Drive, MS EA-3103
Arlington, VA 22203
P 703 358-2639
F 703 358-2548

Wildlife and Hunting Heritage Conservation Council

April 27, 2012

Mr. Robert Abbey, Director
Bureau of Land Management
1849 C Street NW
Washington, D.C. 20240

Re: Managing Recreational Shooting on BLM Lands

Director Abbey:

Thank you for meeting with me and members of the Council's Recruitment and Retention Subcommittee on February 10th to discuss recreational shooting on Bureau of Land Management (BLM) properties. The Council has established an ad hoc group of its members – Jeff Crane, Robert Model, and Steve Sanetti – to work with BLM staff and others to develop recommendations for full Council consideration that encourage both recreational shooting access and responsible behavior. The efforts of this ad hoc group will include specific recommendations to:

- Help develop processes that expedite land conveyances from BLM to states, counties, cities and NGO's that wish to develop shooting ranges (i.e. develop expediting processing related to the Recreation and Public Purposes Act).
- Encourage more responsible behaviors by recreational shooters. The group will examine efforts with NGOs and groups focused on developing and implementing responsible behavior by outdoor recreationists (i.e. Tread Lightly and the Federal Lands Hunting, Fishing and Shooting Sports Roundtable).
- Help develop best management practices for staff in managing safe recreational shooting areas on BLM lands.
- Help develop policies and processes that protect the widest range of recreational access, including recreational shooting, on BLM lands.

As many of America's metropolitan-area populations expand, pressure increases on remaining open areas that support dispersed recreational shooting and other outdoor recreation. The Council and its ad hoc group looks forward to working with BLM to develop tools and policies that will help ensure BLM lands offer ongoing, accessible, high-quality outdoor recreational opportunities for a growing nation.

Sincerely,



John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Cc: Secretary Ken Salazar, Department of the Interior

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Wildlife and Hunting Heritage Conservation Council

December 23, 2011

Mr. Robert Abbey, Director
Bureau of Land Management
1849 C Street NW
Washington, D.C. 20240

Re: BLM Recreational Shooting Policy

Dear Director Abbey:

The Wildlife and Hunting Heritage Conservation Council (Council) was established by Secretary Salazar and Secretary Vilsack to help ensure a future for conservation, hunting, and recreational shooting activities. The Department of the Interior's commitment to traditional outdoor sports is a crucial component in ensuring their continued relevancy and survival on federal lands.

One of the duties of the Council is to provide the Secretaries of the Interior and Agriculture with recommendations regarding "appropriate access to Federal lands for recreational shooting and hunting." The Council was invited by the Bureau of Land Management (BLM) to comment on the draft policy. The Council members are very appreciative of BLM's interest and willingness to engage the Council pro-actively on this critical issue.

During its November 15th and 16th 2011 meeting, the Council discussed the draft policy and agreed to submit a set of comments and recommendations to you for your consideration. They are attached to this letter. The Council felt that in its current form, the draft policy's implementation would have had the practical effect of moving recreational shooting off public lands, thereby diminishing public access to public lands.

Before the Council's comments were transmitted to you, the Secretary issued a memorandum directing that no further action was to be taken to develop (or implement) the draft policy. The Council is appreciative of the Secretary's prompt action and is particularly pleased that the Secretary's memorandum reaffirmed the Department of the Interior's commitment to hunting, fishing, and recreational shooting on public lands as a priority. Furthermore, the Council believes that the management of public uses should be guided by policy. The concept of a policy retains merit.

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The Council looks forward to remaining engaged with BLM on this very important issue. We would welcome the opportunity to sit down and discuss it at your earliest convenience. In addition, we would be very pleased to have you attend either our next meeting in Washington, D.C. on February 14th and 15th or our subsequent mid-year meeting. I will ensure that Joshua Winchell, the Council coordinator, keeps your scheduling office informed of meeting details.

Sincerely,

A handwritten signature in black ink that reads "John Tomke". The signature is written in a cursive, flowing style.

John Tomke, Chair
Wildlife and Hunting Heritage Conservation Council

Cc:
Secretary Ken Salazar, DOI
William Shafroth, DOI

Enclosures

WHHCC RECOMMENDATIONS ON BLM'S RECREATIONAL SHOOTING DRAFT POLICY

The WHHCC provides these recommendations to the BLM on the "Recreational Shooting Policies Under Consideration by BLM" (hereinafter, "draft policy").

Recommendation 1: The Council recommends that BLM revise its current policy of not operating shooting ranges on BLM land, and not renewing leases for shooting ranges. That policy leads to the decrease and eventual elimination of recreational shooting on BLM land. The Council recommends that BLM adopt the Forest Service policy, which provides guidelines for facilitation of privately-operated shooting ranges and un-manned shooting ranges. Recreational shooting is well within BLM's multiple-use mandate and that mandate would include, at a minimum, providing improvements for safe shooting like berms, benches and target holders. The Council believes there is no compelling reason for the BLM to adopt a policy that prohibits leasing land for the development and management of shooting ranges. Further, the Council recommends that BLM work with the Department to remove barriers to designating appropriate sites for informal shooting activities on BLM land.

Recommendation 2: The Council recommends that the BLM revise its draft policy to include a general statement of support for recreational shooting on BLM land. Numerous statements in the draft policy suggest that BLM is now adopting a policy designed to decrease and eliminate recreational shooting on BLM land. The Council finds that such statements run counter to the Executive Order 13443 (referenced in the draft policy) that governs BLM on hunting and recreational shooting. The Council recommends that the draft policy include the following statement similar to the statement of the Chief of the Forest Service in his June 28, 2006 memorandum to employees:

Shooting sports are long standing and appropriate uses of Bureau of Land Management (BLM) lands. Shooting sports bring together the hunting, target shooting and general recreational shooting interests that have enjoyed these activities for many years. With ever increasing populations, use, and urban interface development affecting BLM lands, we must, now more than ever, work with our partners to facilitate safe and responsible use.

Recommendation 3: The Council recommends that the draft policy require that land use plans or plan amendments automatically address areas that may be considered for recreational shooting. The current draft policy requires consideration of recreation shooting only "when it is raised as an issue in external or internal scoping." This contradicts the reference in the 10-Year Plan produced as a result of Executive Order 13443, which recommends that opportunities for hunting and recreational shooting be incorporated into public land management, planning and decision-making. In short, recreational shooting should automatically be addressed in a land management plans. Further it will prevent recreational shooting from being compromised by other land uses that have options for their placement.

Recommendation 4: The Council recommends that BLM notify the entities who are party to the MOU on potential closures of recreational shooting areas with the goal of seeking remedies to any issues of concern. The current draft policy states that if "reasonable attempts to reduce or eliminate the violations by the BLM have been unsuccessful, the authorized officer will close the affected area to recreational shooting." The policy further directs that the above statement be included in Land Use Plans and that the resources, uses, situations, and locations likely to be adversely affected by recreational shooting should be described. The Council recommends that each land use plan require instead that BLM use good-faith efforts to address such issues with local stakeholders prior to any decrease or elimination of recreational shooting activity.

Recommendation 5: The Council recommends that BLM revisit its proposal in the draft policy to include CFR regulations on Codes of Conduct as criteria in land use plans for closing recreational shooting areas. The Council is not aware of other recreational activities being singled out for closure in land use plans under that CFR section, which applies regardless of its inclusion in a land use plan.

Recommendation 6: The Council supports BLM's proposal that public land be sold for the purpose of establishing private shooting ranges, but not as a means of substituting the leasing of BLM land for shooting ranges. The Council's review of sales of public land shows that sales face significant time lags both administratively and statutorily.

Recommendation 7: The Council recommends that BLM work with the approximately 40 hunting, fishing and wildlife organizations and three federal agencies that signed the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable MOU in 2006. BLM is a party to that MOU, whose purpose is to "develop a framework of cooperation among the Parties at the national, regional and local levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal lands." The Council recommends that BLM strengthen its partnership under the MOU in a good-faith effort to enhance recreational shooting activity on BLM land.

WHHCC COMMENTS ON BLM'S RECREATIONAL SHOOTING POLICY

Our concerns with BLM's draft policy are quite serious and begin with the opening paragraph of **Section 1. Laws and Policies Governing Recreational Shooting** which makes no reference to the traditional and historic use of public lands for recreational shooting. As a point of contrast, the Chief of the FS in his memorandum of June 28, 2006 to employees stated in the opening line that:

Shooting sports are long standing and appropriate uses of National Forest System (NFS) lands. Shooting sports bring together the hunting, target shooting and general recreational shooting interests that have enjoyed these activities for many years. With ever increasing populations, use, and urban interface development affecting NFS lands, we must, now more than ever, work with our partners to facilitate safe and responsible use.

We recommend that the policy begin by acknowledging that recreational shooting is a legitimate and traditional use of public lands. In fact, the FS statement would be a good template for such a statement in BLM's policy.

The next paragraph of the policy references Executive Order 13443 (EO) and the recommendations in "Facilitation of Hunting Heritage and Wildlife Conservation" or what is commonly called the "10-Year Plan." We are pleased to see that the EO and the Plan recommendations are referenced in the policy. But, we have concerns about how BLM is interpreting these recommendations, specifically with respect to land management plans, which we will address later in this letter.

In the subsection **BLM Regulation**, it states that the specific shooting activity must not cause a public disturbance; create risks for others; damage, remove or destroy resources; or create a condition of littering, refuse accumulation, and abandoned personal property. The Council concurs that unsafe, unethical and illegal behaviors cannot be condoned of any recreationist on public lands, but we question whether the statement is equally and specifically applied or highlighted in documents regarding other recreational activities on BLM lands.

While it may not be the intent, the tone of the policy gives the Council concern that it could pave the way for easy closure of recreational shooting sites when any of the situations (as noted above) arises, regardless of the offending party. It suggests that recreational shooting is being held to a higher standard of stewardship; that the BLM is possibly more tolerant of issues when associated with other recreational activities. The Council would like to see references in other documents that hold camping and other recreational activities responsible for illegal dumping or cause lands to be closed because they "facilitate and create a condition of littering" or "refuse accumulation." The Council would also like examples of where hiking trails and other areas are closed when natural or cultural resources are damaged or destroyed.

Under the subsection **Shooting Ranges**, the BLM maintains its current policy of not operating shooting ranges or issuing new leases for shooting ranges because of the "potential liability related to lead contamination of the environment." This is a false concern because, as the BLM is fully aware, the EPA has developed guidance for management of spent lead ammunition at shooting ranges. Entitled "Best Management Practices for Lead at Outdoor Shooting Ranges," the guidance is designed to manage lead throughout the life of the range so that in the event the range is closed, there is no environmental issue or costly expense in removing the lead. The EPA developed an Environmental Stewardship Plan (ESP) template for shooting range owners and operators to follow in developing their own management plans for lead ammunition.

By comparison, the FS hosts numerous supervised and unsupervised ranges on Federal forest land across the country. The chapter on shooting ranges in its Special Uses Handbook references EPA's guidance and requires shooting range proponents to submit an ESP before their application can be processed.

Another paragraph in BLM's draft policy states that:

In the expanding urban interface, community- operated shooting ranges are important shooting management tools, providing additional shooting options for the public, reducing social conflicts and safety concerns on adjacent public lands, and ensuring that expended lead ammunition will be periodically removed and recycled in a safe, legal manner. Managed shooting ranges can also provide urban youth with an attractive pathway into lifelong outdoor recreation activities, offering instruction in shooting skills, firearm safety and ethical land use practices and potentially creating a new generation of responsible public land advocates.

This statement strikes the Council as ironic. On one hand, the policy lauds the benefits of a shooting range to a community, including "offering instruction in shooting skills, firearms safety, and ethical land use practices and potentially creating a new generation of responsible public land advocates." But, on the other hand, the policy disallows shooting ranges to be built and managed on public land.

The BLM suggests that its no-lease policy will not have an effect on providing community-operated ranges because it can convey fee title ownership of land to interested local governments or organizations through direct sale, and in certain situations, at less than fair market value under the authority of the Recreation and Public Purposes Act (R&PP). BLM's briefing to the Council suggested that the R&PP process is a rather simple, short-term process. However, based on timelines the Council requested of the Arizona Game and Fish Department on several projects that the Department has been involved in with the BLM, the R&PP process is anything but simple or speedy.

The Department's timeline on a land conveyance project for the proposed Rio Salado Shooting Range brought into focus the fact that land conveyances are contingent upon the willingness of the BLM to devote the staff and resources to the project. In the case of the Rio Salado Shooting Range, the project stalled after a decade's worth of work because BLM said it was overwhelmed with other priorities and did not have the time, at present, to work on the conveyance. So while there may be a suitable site for a shooting range on land that could be conveyed and an entity to purchase that land, a community-based range is just be a dream without BLM's cooperation.

According to the timelines, the R&PP process imposes costly and time-consuming environmental and other compliance requirements that would appear to place a considerable financial burden on the purchaser as well. Another issue is the cost of the land, even if offered below fair market value. It is highly unlikely that any entity other than a local unit of government or a state agency could afford the purchase price. According to the timelines, the land conveyance, if approved, has stipulations attached to it that have to be met by the purchaser so that the land transfer is not free and clear of obligations. The Council is not passing judgment on the necessity of stipulations, only that it takes an entity with deep pockets and resources to engage in the R&PP process. And these hurdles are separate and apart from the costs of designing, building and managing a shooting range.

The Department's timeline for the Tri-State Shooting Range shows that it engaged in the process of looking for an alternative site following the closure of the Bullhead City Gun Club shooting range by the BLM. It took 14 years to find land suitable for locating a new shooting range and for completing the R&PP process. While the decision to convey the site to the Department has been approved, there remain many more steps and costs in the process before construction of the Tri-State Shooting Range can begin.

By way of another example, Nevada's Clark County Board of Supervisors and local shooters spent years trying to work with BLM to identify and transfer an area of public land to the County for a shooting park that would meet the needs of shooters displaced from BLM lands being closed because of Las Vegas' expanding urban interface. Unwilling to face an expensive and lengthy R&PP process, the shooting community sought remedy through a Congressional transfer of BLM land to the County to build what is now the Clark County Shooting Park.

Since the BLM has chosen not to develop or manage public shooting ranges, allowing private parties to fill that community need is an efficient use of resources and partnerships with local citizens. The Council believes there is no compelling reason for the BLM to adopt a policy that prohibits leasing land for the development and management of shooting ranges. It is inconsistent with the Statement of Mutual Interests and Benefits of the MOU and with the directives in the EO. We strongly recommend that this no-lease policy be reversed.

Further, the Council strongly recommends that the policy against developing recreational shooting facilities on public lands be rescinded. The BLM builds infrastructures, like trails, for other recreational activities, but treats recreational shooting as a second rate activity. Recreational shooting is well within BLM's multiple-use mandate and that mandate would include, at a minimum, providing improvements for safe shooting like berms, benches and target holders. The policy of leasing public land for shooting ranges must be restored, but the greater good served is by dismantling the walls of inflexibility that BLM has created against the development and management of shooting ranges.

Section 2. Addressing Shooting Sports in Land Use Plans opens with the statement that "Land use plans or plan amendments should address recreational shooting when it is raised as an issue in external or internal scoping." This contradicts the reference to the 10-Year Plan made near the beginning of the policy which recommends that opportunities for hunting and recreational shooting be incorporated into public land management, planning and decision-making. Moreover, it contravenes Number 4 in the list of what the Federal agencies agree to do in the MOU wherein it clearly states that the agencies will "work with the Private Organizations to assess hunting, fishing, and shooting sports needs and opportunities as part of the Agencies' land management planning."

BLM should not wait to act unless or until recreational shooting is raised as an issue or topic. Recreational shooting should automatically be addressed in a land management plan. In that way, the BLM becomes proactive, rather than passive, in managing recreational shooting. Areas that are well suited for shooting ranges or more intensive informal recreational shooting should be identified, particularly those areas in reasonable proximity to western communities. As a matter of course, these areas should be identified in the planning process to avoid being compromised by other land uses that could have options for their placement.

This section also addresses the criteria for closing areas to shooting. Similar to the list of unethical, unsafe, and illegal behaviors listed earlier in the policy, this section states that if "reasonable attempts to reduce or eliminate the violations by the BLM have been unsuccessful, the authorized officer will close the affected area to recreational shooting." The policy further directs that the above statement be included in Land Use Plans and that the resources, uses, situations, and locations likely to be adversely affected by recreational shooting should be described.

This statement also begs the question as to whether recreational shooting stands alone in receiving these admonishments. The Council is concerned that this policy has the effect of separating recreational shooting from all other recreational activities in terms of how the BLM manages it and responds to problems. We would like information regarding similar statements that are included in Land Use Plans for other recreational activities.

Number 5 in the MOU's list of what the Federal agencies agree to do states the following:

When sites used by shooting sports enthusiasts on federal lands are unsafe or in unsuitable locations; are in need of environmental or trash cleanup; are not meeting best management practices; or are in need of maintenance, reconstruction, or modernization, work with the Private Organizations to resolve these issues in a mutually satisfactory manner and consistent with applicable laws, regulations, and Agency policies.

This agreed-upon action speaks to BLM working in partnership with the NGO signatories to the MOU in order to address issues related to recreational shooting. This partnership is not reflected in the policy. Where the MOU is referenced is in the line, “This MOU requires that the BLM notify shooting organizations of such closures or restrictions and alert them to public comment opportunities.” At that point, the opportunity to address issues has passed.

This statement falls woefully short of the mission and purposes of the MOU. The MOU is a partnership which means that the signatory NGOs are accorded a status higher than a member of the public commenting on a closure. The MOU is designed to help prevent closures, not to have the NGOs notified that a closure is taking place. The Council recommends that the policy be amended to recognize the MOU partnership and to express BLM’s desire to work with its NGO partners to resolve issues in a “mutually satisfactory manner.”

In **Section 3. Management of Recreational Shooting, Identification of Shooting Areas, and Closures**, the BLM again pins the continuation of shooting on whether shooters adhere to standard safety procedures and comply with applicable BLM policies and regulations, as well as with local or state laws and ordinances. We all know there are those who use public lands with little consideration for the stewardship of resources or with respect toward other visitors. Stating it again, the Council is not suggesting tolerance of unsafe and illegal behaviors, but wants to know if all other recreational activities are held to this same standard.

The Council agrees with the policy’s directive that areas of low risk or resource conflict be identified for dispersed shooting activities. These are the kinds of decisions that the Council would expect to see in land management planning processes. But, this section admonishes BLM offices to avoid *designating* specific sites or ranges as suitable for recreational shooting. The Council would appreciate an explanation from the BLM as to the distinction between identifying and designating areas for shooting and whether this distinction is equally applied to other recreational areas like OHV trails and campsites.

The policy does not permit BLM offices to develop facilities specifically designed for shooting activities such as benches, rests, target posts, hay bale, target backstops, etc. The BLM builds trails and yet opposes even the most basic elements supporting safe target shooting. The BLM speaks about unsafe shooting practices and conflict with other recreationists or resources. Where the reduction or elimination of such conflicts can be achieved, this should be highly encouraged, not forbidden as this policy directs.

One of the questions asked under **Safety** in the “Factors for Evaluating Risk” is whether a backstop is available, mostly of dirt, and at least 15 ft. high x 15 ft. wide. This suggests a berm and if the BLM sees that as an important safety element, then it seems logical that the BLM offices should be able to build berms, as well as add other basic improvements such as target holders. As requested above, the Council asks the Secretary to examine the relevancy of BLM’s policy that prohibits the construction of shooting ranges, including the most basic infrastructure for safe shooting.

Section 4 Information, Education, and Outreach is excellent in its guidance to the field with respect to providing website information on areas open and closed to shooting; publishing the basic rules of safe shooting; providing shooting ethics and safety materials; displaying this information at major access entry points; developing partnerships; and using the “Respected Access is Open Access” materials to broadcast safe and responsible shooting (and other recreation-specific messages). The hunting and shooting sports community is vested in the Respected Access campaign along with the BLM and the FS and will appreciate that specific reference to the campaign is made in the policy. The only suggestion that the Council has for this section is to include a reference to the MOU with respect to establishing

partnerships with shooting sports advocacy organizations. The national level partnership was established with the signing of the MOU.

The last section provides **Background** and should be incorporated into the front section of the policy. BLM's no-lease policy and its prohibition against providing infrastructure for recreational shooting are not in step with the statement that "recreational shooting continues to be popular on public lands, and public demand for safe, legal places to shoot remains high." Rising conflicts associated with the expanding urban interface, increasing numbers of recreationists, and the variety of recreational activities are clear messages that the BLM needs to take a proactive management approach to recreational shooting beyond information, enforcement, education and outreach. Although the latter are extremely important in terms of supporting shooting opportunities and instilling good outdoor ethics, the BLM is the manager of a vast Federal estate and should be stepping up to the plate in a more significant way by providing for shooting ranges through leasing and providing infrastructure where it would reduce conflicts and improve safety.

In summary, the Council believes the draft policy sends, at best, a mixed message and, at worst, a negative message to land managers about what position recreational shooting occupies within the spectrum of recreational uses on BLM-managed land. The policy fails to recognize that recreational shooting has one of the lowest incidences of death and injury compared to virtually any other outdoor recreational activity. The policy is prejudicial and discriminatory to target shooters as compared to other recreationists and undermines the spirit and intent of the MOU which was created to protect and promote recreational shooting on public lands. And equally of concern, the policy ignores the partnership that was developed through the MOU to address opportunities and issues associated with recreational shooting and hunting.

Recreational Shooting Policies Under Consideration by BLM

1. Laws and Policies Governing Recreational Shooting.

BLM Policy

Recreational shooting (target shooting) is one of many activities that the Bureau of Land Management (BLM) may allow on public lands as part of its discretion to manage for multiple uses. In accordance with the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM typically manages a wide range of multiple use activities on most public lands provided that they do not impair the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, and archaeological values, and that they do not endanger human health, safety, or property.

Executive Order 13443, "Facilitation of Hunting Heritage and Wildlife Conservation", issued in 2006, directed the Department of the Interior and its component agencies, bureaus and offices "to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat." The Order called for a comprehensive 10-year Recreational Hunting and Wildlife Conservation Plan that would set forth an agenda for implementing the actions called for in the Order. The ten-year action plan was issued in December, 2008. Among its recommendations that address recreational shooting: "... incorporate hunting and recreational shooting into federal agency's planning processes; Revise BLM/USDA Forest Service management plans to designate shooting areas; Incorporate opportunities for hunting and recreational shooting into public land management, planning, and decision-making. Specifically, consider integrating hunting and recreational shooting opportunities in all federal agency plans for travel management, land management, analyses under the National Environmental Policy Act (NEPA), and related road closures and other access limitations; ensuring that hunting and recreational shooting opportunities are a priority."

BLM Instruction Memorandum IM 2006-006, details the process of implementing E.O. 13443. and provides a link to the Order. The IM can be accessed on the web at: http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/20080/im_2008-006.html

BLM Regulations

Unless there is a relevant Federal law or regulation governing the use of firearms in effect, state and local laws and ordinances regulating the use and possession of firearms apply on BLM managed public lands and are typically enforced by local law enforcement officials (43 C.F.R. § 8365.1-7). With the exception that the "[d]ischarge or use [of] firearms, other weapons, or fireworks," is prohibited on developed recreation sites and areas, unless otherwise authorized, 43 C.F.R. § 8365.2-5(a), shooting and possession and use of firearms are allowed on public lands managed by the BLM. However, the specific shooting activity must not:

- Cause a public disturbance or create risk to other persons on public lands. 43 C.F.R. § 8365.1-4(a) (Public health, safety and comfort);
- Deface, remove or destroy natural features, native plants, cultural resources, historic structures or government and/or private property. 43 C.F.R. § 8365.1-5(a)(1);

- Facilitate and create a condition of littering, refuse accumulation and abandoned personal property. 43 C.F.R. Sec. 8365.1-1;
- Violate existing use restriction, a closure and restriction order, or supplementary rules notice. 43 C.F.R. §§ 8365.2-5(a), 8364.1, 8365.1-6.

Shooting Ranges

The BLM's policy prohibits the agency from directly operating shooting ranges, or from issuing new leases of public lands for shooting ranges, principally because of the agency's potential liability related to lead contamination of the environment. New shooting ranges cannot be authorized by any type of lease or other land use authorization that does not transfer fee title to the applicant. (See IM-2008-074 : <http://web.blm.gov/internal/wo-500/directives/dir-08/im2008-074.html> and IM-2008-074, Change 1 : <http://web.blm.gov/internal/wo-500/directives/dir-08/im2008-074ch1.html>)

In the expanding urban interface, community-operated shooting ranges are important shooting management tools, providing additional shooting options for the public, reducing social conflicts and safety concerns on adjacent public lands, and ensuring that expended lead ammunition will be periodically removed and recycled in a safe, legal manner. Managed shooting ranges can also provide urban youth with an attractive pathway into lifelong outdoor recreation activities, offering instruction in shooting skills, firearm safety and ethical land use practices and potentially creating a new generation of responsible public land advocates.

When identifying lands suitable for disposal in Land Use Plans, field offices are strongly encouraged to consider the use of some of these lands for community-operated shooting ranges and should facilitate the transfer of fee title ownership of suitable lands to interested local governments or organizations through direct sale when appropriate. Field offices can employ the patent provisions of the Recreation and Public Purposes (R&PP) Act, 43 U.S.C. § 1721, to convey ownership of lands for shooting ranges to non-profit organizations or local governments at less than fair market value (in some cases). Currently about 40 shooting ranges operate on BLM-administered public lands under the discontinued lease provisions of the R&PP Act. Field offices are encouraged to convert previously leased shooting ranges to patent utilizing the provisions of H-2740-1 (Recreation and Public Purposes Handbook).

2. Addressing Shooting Sports in Land Use Plans.

Land use plans or plan amendments should directly address recreational shooting when recreational shooting is raised as an issue in external or internal scoping. Plans should consider areas that may remain open to dispersed shooting, as well as considering areas that may be more appropriately closed to shooting or areas where shooting may be restricted. Addressing shooting issues specifically in land use plans will allow for the consideration of a range of alternatives and will provide opportunities for public involvement. This only applies to new Resource Management Plans and amendments, not to plans or amendments already issued. Recreational shooting may also be addressed in activity-level planning, where appropriate.

Special consideration should be given to the applicable state and local laws and ordinances to identify or support closures or restrictions when addressing recreational shooting in land use

plans. Consideration should also be given to adopting state and local laws/ordinances as BLM supplementary rules to allow for better enforcement by BLM officers.

The criteria for closing areas to shooting in Land Use Plans should refer to BLM's Rules of Conduct regulations (43 CFR 8365). The following statement, at a minimum, should be included in all LUPs addressing recreational shooting:

When the authorized officer determines that a site or area on BLM-managed lands used on a regular basis for recreational shooting is creating public disturbance, or is creating risk to other persons on public lands; is contributing to the defacement, removal or destruction of natural features, native plants, cultural resources, historic structures or government and/or private property; is facilitating or creating a condition of littering, refuse accumulation and abandoned personal property is violating existing use restrictions, closure and restriction orders, or supplementary rules notices, and reasonable attempts to reduce or eliminate the violations by the BLM have been unsuccessful, the authorized officer will close the affected area to recreational shooting:

The above statement should be included in Land Use Plans, and should describe as specifically as possible the resources, uses, situations, and locations likely to be adversely affected by recreational shooting. The statement should be included in the section that sets forth the decisions common to all alternatives. If analyzed appropriately, temporary closures and restrictions considered under this process will not require further National Environmental Policy Act (NEPA) analysis and can be processed with a Determination of NEPA Adequacy when implementation of temporary shooting closures or restrictions are required.

3. Management of Recreational Shooting, Identification of Shooting Areas, and Closures

Active management of recreational shooting by identifying areas of low risk or resource conflict that remain open for dispersed shooting activities, and closing areas that are identified as having high risks or conflicts through a temporary or permanent closure are effective ways to reduce risks while preserving recreational opportunities for the public. Decisions regarding recreational shooting require the BLM to balance safety and resource protection issues with its multiple-use mandate. Identification of areas that remain open to dispersed recreational shooting should be limited to identifying broad areas or polygons where shooting may continue as long as shooters adhere to standard firearm safety procedures and comply with applicable BLM policies and regulations, as well as with local or state laws and ordinances. BLM offices must avoid designating specific sites or ranges as suitable for recreational shooting, and should not develop facilities specifically designed for shooting activities such as benches, rests, target posts, hay bale target backstops, etc.

State or field offices must exercise due care in making the discretionary decision to allow or disallow recreational shooting in identified areas. Due care can be properly exercised by carefully evaluating risk factors and identifying shooting areas in places where risks and conflicts are low and shooting can be effectively and safely managed.

Factors for evaluating, identifying, and managing areas of low risk or resource conflict for dispersed shooting activities, as well as closing areas with high risks or conflicts for dispersed shooting are outlined in Attachment 1.

Closures and Restrictions

Safety or resource damage issues may require temporary or permanent closure or restriction of areas to recreational shooting. If a permanent closure or restriction is required, it must be addressed in a land use plan or plan amendment and requires compliance with the National Environmental Policy Act (NEPA) in advance of such action. For temporary closures or restrictions, field offices must follow the procedures detailed in WO IM-2010-028, "Requirements for Processing and Approving Temporary Public Lands Closure and Restriction Orders," including compliance with NEPA prior to the closure or restriction. Temporary closures or restrictions for shooting activities are permitted when the authorized officer finds such action is necessary to protect persons, property, and public lands and resources (43 CFR § 8364.1). In general, temporary closures cannot exceed 24 months in duration.

The agency's NEPA analysis should identify alternative recreational shooting opportunities that are still available on public lands in the vicinity of the closed or restricted area.

Closure or restriction orders that may affect hunting access, shooting sport activities, or the discharge of firearms must be in compliance with the Federal Land Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding (MOU). This MOU requires that the BLM notify shooting organizations of such closures or restrictions and alert them to public comment opportunities.

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2007/im_2007-041.html

Lands closed or restricted to recreational shooting by the BLM typically remain open to hunting, subject to the state and local laws in effect.

4. Information, Education, and Outreach

- Each BLM state, field office, and special management area recreation website should contain a shooting sports section, which includes maps showing areas open to shooting, and areas that have been closed to shooting, and should provide general directions on how to access identified dispersed shooting areas. Websites should also promote general safe shooting and environmentally sound practices, and describe situations on public lands where it may not be safe to shoot and situations where it is generally safer to shoot.
- Attachment 2, *The Four Principles of Responsible Shooting on Public Lands* provides basic rules for safe shooting. BLM's webpage, "*Hunting and Shooting Sports*" provides a variety of additional useful information for the public, including information on minimizing potential risks from physical contact with expended lead ammunition in dispersed shooting areas. and can be accessed at:

http://www.blm.gov/wo/st/en/prog/Recreation/recreation_national/Shooting_Sports_Hunting.html.

- Shooting ethics and safety materials are also available free for your use on the Tread Lightly! website at: http://www.treadlightly.org/files/page_text/shooting_tips_sm.pdf.
- Shooters remain legally responsible for knowing the rules, and should check with the local BLM office before venturing onto public lands to shoot. Where possible, major access entry points to areas open to shooting should display current information on billboards or kiosks, including maps of the area with shooting regulations and safe shooting practices.
- Where possible, state, field offices, and special management areas should establish partnerships with shooting sports advocacy organizations and state fish and wildlife agencies to help manage or maintain shooting areas and develop public presentations and materials on shooting ethics and appropriate shooting areas on public lands for use in meetings, hunter education classes, school groups, etc. In keeping with the vision of the President's America's Great Outdoors (AGO) initiative, recognize that hunting and shooting sports can provide an excellent pathway for building stewardship values and engaging youth in conservation and the outdoors.
- Use the "Respected Access is Open Access" materials developed for the BLM and others by Tread Lightly! to broadcast the message of safe and responsible shooting in appropriate places on public lands. Place signs, kiosks and billboards in well-traveled locations to push the responsible shooting message and raise general awareness of the issues surrounding shooting on public lands. (www.respectedaccess.org)

Background: Recreational shooting is a permissible use of public lands. As the West has become more populated, recreational shooters now often find themselves in conflict with other public lands users, and the BLM is frequently called on to mediate these conflicts.

In the past, BLM managers have avoided identifying areas available for recreational shooting, and instead have managed this use by closing areas to shooting in order to address public safety and resource concerns. This past management practice has created some confusion about where public land remains open to recreational shooting. Typically, little useful, specific information about where the public can shoot is available on maps, websites, or signs. Despite rising conflicts, recreational shooting continues to be popular on public lands, and public demand for safe, legal places to shoot remains high.

This guidance is based on the understanding that identifying areas where recreational shooting presents lower risks and conflicts while closing areas where risks are high may reduce shooting related conflicts, and may also reduce legal claims against the BLM for shooting-related injuries or damages.

From: [Joshua Campbell](#)
To: [Recce, Susan](#)
Subject: Re: BLM shooting policy
Date: Wednesday, December 6, 2017 5:53:18 PM

Great, thanks

Sent from my iPhone

> On Dec 6, 2017, at 5:35 PM, Recce, Susan <SRecce@nrahq.org> wrote:

>

> Josh,

>

> The BLM draft policy which the agency intended to adopt without scrutiny from anyone outside the agency is in the document marked "scans". It is not dated, but you will see by the WHHCC letters that this took place 6 years ago. The letter dated 2011 contains WHHCC's comments to BLM on the draft policy. The other two WHHCC letters were attempts to engage the BLM in a dialogue about the withdrawn policy and efforts to develop a policy that the advisory council and the constituency it represented felt was a fair and balanced policy.

>

> Susan

> <WHHCC letter BLM rec shooting policy.pdf>

> <letter on rec shooting.pdf>

> <WHHCC BLM shooting sports letter Dec 2011.pdf>

> <Scans17.pdf>

From: [Recce, Susan](#)
To: joshua.campbell@sol.doi.gov
Subject: agency wide policies
Date: Tuesday, December 19, 2017 11:47:13 AM

Hi Joshua,

Following our phone conversation yesterday, I was thinking that if the Secretary wants to pursue the development of BLM policies on hunting, fishing and recreational shooting (which, of course, I hope he does), and a structure is created that allows dialogue with the NGOs representing these recreational interests on federal public lands, it might be good to include US Forest Service leadership in the discussion.

BLM and USFS are the only federal agencies that allow dispersed recreational shooting on the lands they manage. The USFS and the US Army Corps of Engineers are the only federal agencies that allow the development of formal shooting ranges.

The National Park Service and the US Fish and Wildlife Service do not allow shooting, informal or formal, except in the hunting context. I am not suggesting that changes because the organic acts of NPS and FWS do not allow for shooting.

I believe a significant achievement can be made by focusing on BLM and USFS.

Thanks for listening!

Susan

From: [Campbell, Joshua](#)
To: [Recce, Susan](#)
Subject: Re: agency wide policies
Date: Wednesday, January 3, 2018 4:30:26 PM

Sure thing, let me look into it a little further and start the conversation first with BLM. Lets stay in touch. Hope you enjoyed the holidays.

On Tue, Dec 19, 2017 at 11:46 AM, Recce, Susan <SRecce@nrahq.org> wrote:

Hi Joshua,

Following our phone conversation yesterday, I was thinking that if the Secretary wants to pursue the development of BLM policies on hunting, fishing and recreational shooting (which, of course, I hope he does), and a structure is created that allows dialogue with the NGOs representing these recreational interests on federal public lands, it might be good to include US Forest Service leadership in the discussion.

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I believe a significant achievement can be made by focusing on BLM and USFS.

Thanks for listening!

Susan

From: [Joshua Campbell](#)
To: SRecce@nrahq.org
Subject: Crossbows
Date: Thursday, January 25, 2018 1:39:25 PM

Hey! Who should I talk with regarding the recent crossbows on public lands issue? I hope you are well.

Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Re: Crossbows
Date: Friday, January 26, 2018 12:25:35 PM

Not sure. I will find out. All is well. THANKS.
Susan

From: Joshua Campbell <joshua.campbell@sol.doi.gov>
Sent: Thursday, January 25, 2018 1:39 PM
To: Recce, Susan
Subject: Crossbows

Hey! Who should I talk with regarding the recent crossbows on public lands issue? I hope you are well.

Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Re: Crossbows
Date: Friday, January 26, 2018 12:25:49 PM

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Susan

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Sent: Thursday, January 25, 2018 1:39 PM
To: Recce, Susan
Subject: Crossbows

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Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Re: Crossbows
Date: Friday, January 26, 2018 5:49:44 PM

For some reason, emails from DOI seem not to get through. Below is the person you want to contact about cross bows. I will send by text.

Have a good weekend.

Susan

Dan Forster, Director of Government Relations
Archery Trade Association
4652 Hawkins Academy Road
Social Circle, GA 30025
(O/C) (b) (6)
(TF) 866.266.2776 Ext. 128
danforster@archerytrade.org

From: Joshua Campbell <joshua.campbell@sol.doi.gov>
Sent: Thursday, January 25, 2018 1:39 PM
To: Recce, Susan
Subject: Crossbows

Hey! Who should I talk with regarding the recent crossbows on public lands issue? I hope you are well.

Sent from my iPhone

From: [Recce, Susan](#)
To: [Joshua Campbell](#)
Subject: Re: Crossbows
Date: Friday, January 26, 2018 5:49:45 PM

For some reason, emails from DOI seem not to get through. Below is the person you want to contact about cross bows. I will send by text.

Have a good weekend.

Susan

Dan Forster, Director of Government Relations
Archery Trade Association
4652 Hawkins Academy Road
Social Circle, GA 30025
(O/C) (b) (6)
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danforster@archerytrade.org

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Sent: Thursday, January 25, 2018 1:39 PM
To: Recce, Susan
Subject: Crossbows

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